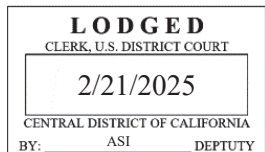
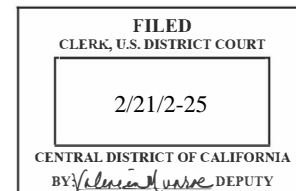


UNITED STATES DISTRICT COURT



for the

Central District of California



United States of America

v.

Juan Luis Magdaleno-Perez,
aka "Joey Mendez,"

Defendant(s)

Case No. 2:25-mj-00897-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 26, 2021, in the county of Ventura in the Central District of California, the defendant(s) violated:

Code Section

8 U.S.C. § 1326(a)

*Offense Description*Illegal Alien Found in the United
States Following Deportation

This criminal complaint is based on these facts:

Please see attached affidavit.☒ Continued on the attached sheet.*/s/ Susanna Espinoza, HSI Special Agent**Complainant's signature*

Susanna Espinoza, HSI Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 2/21/25
*Judge's signature*City and state: Los Angeles, California

Hon. Charles Eick, U.S. Magistrate Judge

*Printed name and title*AUSA: David H. Chao

AFFIDAVIT

I, Susanna Espinoza, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Juan Luis MAGDALENO-PEREZ, also known as "Joey Mendez" ("MAGDALENO-PEREZ"), charging him with violating Title 8, United States Code, Section 1326(a): Illegal Alien Found in the United States Following Deportation.

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show that there is sufficient probable cause for the requested complaint and warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. BACKGROUND OF AFFIANT

3. I am a Special Agent ("SA") with Homeland Security Investigations ("HSI") within the United States Department of Homeland Security ("DHS") and have been so employed since May 2024. Currently, I am assigned to the HSI Office of the Special Agent in Charge in Los Angeles, California.

4. I am a sworn "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(c), that is, a government agent engaged in enforcing the criminal

laws and duly authorized by the Attorney General to request a search warrant.

5. Prior to my tenure as a Special Agent, I served in the United States Navy in an Active Duty status aboard the aircraft carrier USS Dwight D. Eisenhower. During that time, I served for one year as a military law enforcement officer for the In-Port Security Forces Division. While serving in this capacity, I worked alongside the crew's Master-At-Arms enforcing the United States Code of Military Justice.

6. I graduated from the University of California - Riverside with a Bachelor of Arts degree in Liberal Studies. I am also a graduate of the Criminal Investigator Training Program and, subsequently, the HSI SA Training Academy held at the Federal Law Enforcement Training Center in Glynco, Georgia. During the approximately six-month program, I completed academic and practical courses covering criminal investigative functions as well as criminal, immigration, and customs law.

III. STATEMENT OF PROBABLE CAUSE

7. Based on my review of criminal history records, I am aware that MAGDALENO-PEREZ (DOB 11/8/1974) was arrested on or about July 26, 2021, by the Ventura County Sheriff's Office, for a violation of Health and Safety Code Section 11550(a), and subsequently released. Based on my review of electronic records contained within DHS computer indices, I am aware that on or about April 8, 2022, immigration authorities received an electronic notification from the National Criminal Analysis and Targeting Center, a center within ICE, informing them that

MAGDALENO-PEREZ (DOB 11/8/1974) was in the United States. Additionally, through public records, I learned that MAGDALENO-PEREZ's last known address as of November 2024 was located at 1391 Patricia Avenue, Simi Valley, CA 93065. Further assessment of public records indicates that MAGDALENO-PEREZ possesses a cellphone number containing a local area code: (805) 387-0220, which is valid as of January 2025.

8. On or about February 19, 2025, I reviewed electronic records contained within DHS computer indices on MAGDALENO-PEREZ. Records checks revealed that MAGDALENO-PEREZ is a citizen of Mexico. Based on my training and experience, I know that DHS computer indices track and document each time an alien is deported or excluded from the United States by Immigration and Customs Enforcement ("ICE"), was deported or excluded by the former Immigration and Naturalization Service ("INS"), or is granted permission to enter or re-enter the United States. The DHS computer indices confirmed that defendant had been removed, deported, and/or excluded from the United States on or about the following dates: November 22, 2000 and February 12, 2016. DHS computer indices further indicated that defendant had not applied for, or obtained from, the Attorney General or the Secretary of Homeland Security, permission to re-enter the United States.

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IV. CONCLUSION

9. For all the reasons described above, there is probable cause to believe that defendant has committed a violation of Title 8, United States Code, Section 1326(a): Illegal Alien Found in the United States Following Deportation.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 21st day of
February 2025.

A handwritten signature in black ink, appearing to read 'C. F. Eick', is written over a horizontal line.

HONORABLE CHARLES F. EICK
UNITED STATES MAGISTRATE JUDGE